

EXHIBIT "A"

1 IN THE DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 CASE NO. 1:23-cv-23004-WPD

4 JANE DOE, a minor, by and
5 through her mother and next
6 friend, MOTHER DOE,
7 Plaintiff,
8 vs.

9 ACADEMIR CHARTER SCHOOLS, INC.,
10 and SUPERIOR CHARTER SCHOOL
11 SERVICES, INC.,
12 Defendants.

13 _____/

14
15 DEPOSITION OF HIRA CHAUDRY

16
17 WEDNESDAY, MAY 15, 2024
18 4:00 p.m. - 5:43 p.m.

19 601 BRICKELL KEY DRIVE, SUITE 700
20 MIAMI, FLORIDA

21 - - -

22
23 Reported By:

24 Katiana Louis
25 Notary Public, State of Florida
Miami Office #27402

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I N D E X

Examinations Page

HIRA CHAUDRY
DIRECT EXAMINATION BY MR. MACDONALD 4

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1 Thereupon:

2 HIRA CHAUDRY

3 was called as a witness, and having been first
4 duly sworn and responding "Yes," was examined and
5 testified as follows:

6 DIRECT EXAMINATION

7 BY MR. MACDONALD:

8 Q. Good afternoon. My name is Kyle
9 MacDonald and I represent Jane Doe in her lawsuit
10 against AcadeMir Charter Schools, Inc. and
11 Superior Charter School Services, Inc. Thank you
12 for being here today.

13 A. You're welcome.

14 Q. Can you please start by stating your
15 full name for the record, please?

16 A. My name is Hira Hills, formerly Hira
17 Chaudry.

18 Q. Have you ever had your deposition taken
19 before?

20 A. No, I haven't.

21 Q. Since this is your first deposition,
22 I'll go over a few things so we're both on the
23 same page. Do you understand that you have been
24 placed under oath and you have an obligation to
25 testify truthfully here today?

1 A. Yes.

2 Q. And do you understand that -- strike
3 that.

4 Now, in terms of your responses, the
5 court reporter cannot transcribe anything
6 inaudible like a gesture or shrug. So, be sure
7 to answer clearly just as you have been.

8 A. Okay.

9 Q. And the court reporter also cannot
10 accurately reflect your responses if we speak at
11 the same time. So I will wait for you to finish
12 your answers and I ask that you wait until I
13 finish my questions.

14 A. Okay.

15 Q. Now, we want to ensure that we get your
16 best testimony, so if there is any question that
17 I ask that you find confusing or you don't
18 understand, just let me know and I can try and
19 rephrase the question for you.

20 A. Okay.

21 Q. On that same note, if you do not say
22 anything, I'm going to assume you understood the
23 question as asked. Okay?

24 A. Okay.

25 Q. If you need to take a break at any

1 point, go to the bathroom, get a drink of water
2 or take a breather, please let me know and I'm
3 happy to do so.

4 A. Okay.

5 Q. Is there anything that prevents you from
6 thinking clearly and testifying truthfully here
7 today?

8 A. No.

9 Q. Now, for the purposes of today's
10 deposition, I'll refer to AcadeMir Charter
11 Schools, Inc. as just AcadeMir if that's okay
12 with you?

13 A. Yes.

14 Q. And on the same note, I'll refer to my
15 client who is a minor, , as Jane Doe
16 if that's okay with you?

17 A. Okay.

18 Q. What did you do to prepare for today's
19 deposition?

20 A. I had a like a prep meeting. And that
21 was it.

22 Q. And was that prep meeting with an
23 attorney?

24 A. Yes.

25 Q. And is that counsel for AcadeMir,

1 Ms. Karron?

2 A. With AcadeMir?

3 Q. Who is the attorney?

4 A. Julie. And there was, I think -- I
5 can't remember the other lawyer's name that was
6 present.

7 Q. Did you speak to anyone else besides the
8 attorneys you just mentioned regarding your
9 deposition today?

10 A. No.

11 Q. Did you review any documents prior to
12 your deposition here today?

13 A. No.

14 Q. What is your current address?

15 A. 11241 Southwest 152nd Place, Miami,
16 Florida 33196.

17 Q. And how long have you lived at that
18 address for?

19 A. I'm trying to do the math. Around 11 to
20 12 years.

21 Q. Have you ever been a party to a civil
22 lawsuit before?

23 A. No.

24 Q. Have you ever been a witness in any
25 other lawsuit before?

1 A. No.

2 Q. Did you attend college?

3 A. Yes.

4 Q. Where did you attend college?

5 A. FIU.

6 Q. And did you earn a degree at FIU?

7 A. I did.

8 Q. And what degree was that?

9 A. A bachelor's in early childhood.

10 Q. And do you have any other degrees
11 besides that one?

12 A. I'm currently getting my master's from
13 FIU.

14 Q. Do you have any professional
15 certifications?

16 A. That go along with my teaching
17 certifications there are things that get added to
18 that. An ESOL certification, a reading
19 endorsement, and once I finish my master's I'll
20 have another reading K through 12 certification.

21 Q. Where do you currently work?

22 A. At public school, an elementary school.

23 Q. What is that called?

24 A. Sunset Park Elementary School.

25 Q. What do you do at Sunset Park?

1 A. I'm a teacher.

2 Q. When did you begin working at Sunset
3 Park?

4 A. This school year, in August.

5 Q. August of 2023 then?

6 A. Yes.

7 Q. Where did you work prior to Sunset Park?

8 A. AcadeMir Charter School.

9 Q. And were you a teacher at AcadeMir as
10 well?

11 A. Yes.

12 Q. When did you first begin working for
13 AcadeMir?

14 A. In 2018.

15 Q. And what grade were you teaching when
16 you started in 2018?

17 A. Kindergarten.

18 Q. And did you remain a kindergarten
19 teacher for the rest of your time at the school?

20 A. Yes, I did.

21 Q. Who did you report to as a kindergarten
22 teacher at AcadeMir?

23 A. Administration. And I was also the
24 grade level lead for my grade level so it was
25 directly to administration.

1 Q. Was it anyone in particular in
2 administration or multiple people?

3 A. The first few years we were all in one
4 building, so it was all of administration and
5 then when we were at the primary learning center
6 it was to one assistant principal.

7 Q. And when was that change to the primary
8 learning center, roughly?

9 A. I was there for two years. So 2021 to
10 2022, and 2022 to 2023.

11 Q. And why did you leave AcadeMir?

12 A. To go to public school.

13 Q. Why did you want to go to public school?

14 A. They have better benefits and they pay
15 for your master's and continuing education.

16 Q. When you worked at AcadeMir as a
17 teacher, did you undergo any type of training?

18 A. Yes, lots of training.

19 Q. Did you ever receive any training on
20 Title IX?

21 A. Yes.

22 Q. And what training was that?

23 A. Through our ADP, like HR, modules and
24 webinars.

25 Q. And how often did you have to do that

1 ADP training?

2 A. At the beginning of the school year, we
3 would have certain ones to complete. I don't
4 remember specifically.

5 Q. But you had to do a training every year?

6 A. Yeah.

7 Q. Did the topics vary depending on the
8 year?

9 A. Yes.

10 Q. What topics were covered in those
11 trainings depending on the year?

12 A. I mean, I don't -- I honestly can't
13 remember. I can list a few off the top of my
14 head, like harassment, Florida statutes in the
15 workplace, how to -- communication. And I don't
16 know. Honestly, I can't remember right now.
17 Sexual harassment, workplace.

18 Q. And did any of those ADP trainings cover
19 Title IX specifically?

20 A. I don't remember.

21 Q. And besides those ADP trainings, did you
22 receive any other training on Title IX during
23 your time at AcadeMir?

24 A. No.

25 Q. Did you receive any training on sexual

1 harassment while you were employed at AcadeMir?

2 A. Yeah. Through those -- well, through
3 the ADP.

4 Q. And were those sexual harassment topics
5 covered each year or did it depend?

6 A. Each year.

7 Q. And did you earn any kind of certificate
8 when you completed these trainings?

9 A. Yes.

10 Q. And did you have to do anything with
11 those certificates?

12 A. No, they were in the portal.

13 Q. What portal?

14 A. Like, ADP has a work portal.

15 Q. Did you have to send certificates to
16 anyone at AcadeMir?

17 A. Sometimes for some trainings.

18 Q. Do you know if during your employment
19 with AcadeMir they had any written Title IX
20 policies?

21 A. I can't remember.

22 Q. Do you recall if during your employment
23 at AcadeMir, AcadeMir had any written policies on
24 sexual harassment?

25 A. Can you clarify? Would that be like

1 coworker -- like, we had, like, a staff room that
2 had posters posted, but I don't know
3 specifically.

4 Q. Were there any written policies
5 regarding sexual harassment besides posters? I
6 guess, anything in a handbook? Are you aware?

7 A. We were given a handbook, yes.

8 Q. An employee handbook?

9 A. Yes.

10 Q. During your employment at AcadeMir, did
11 you receive any training on how to handle student
12 complaints of sexual harassment?

13 A. Specifically, I don't remember.

14 Q. And during your employment at AcadeMir,
15 did you receive any training on how to handle
16 student complaints of discrimination?

17 A. I don't remember. I think things were
18 introduced like my first year, but I don't
19 remember.

20 Q. While you were employed at AcadeMir, do
21 you know if the school had a Title IX
22 coordinator?

23 A. I don't know. No.

24 Q. While you were employed at AcadeMir, do
25 you know who was responsible for handling Title

1 IX generally?

2 A. No.

3 Q. While you were a teacher at AcadeMir,
4 did you ever receive any reports of sexual
5 harassment?

6 A. Reports as -- can you clarify that
7 question? Can you repeat it?

8 Q. While you were a teacher at AcadeMir,
9 did any student make any allegations that you
10 considered to be sexual harassment?

11 A. Physically, no.

12 Q. Were there other kinds of sexual
13 harassment reported that was not physical?

14 A. No.

15 Q. Then what did you mean by "physically"?

16 A. Physically.

17 Q. And are you familiar with my client
18 Jane?

19 A. Yes.

20 Q. She was a student at AcadeMir; is that
21 right?

22 A. Yes.

23 Q. Did you teach Jane?

24 A. I did.

25 Q. And when did you teach her while you

1 were at AcadeMir?

2 A. Last school year, 2022 to 2023.

3 Q. And were you Jane's full-time teacher?

4 A. Yes.

5 Q. How often did you interact with Jane?

6 A. She was in my classroom every day from
7 8:30 to 2:30.

8 Q. During the time you were Jane's
9 teacher did she ever have any disciplinary
10 issues?

11 A. Yes, she did.

12 Q. What disciplinary issues would she have?

13 A. Towards the beginning of the year, she
14 would have, I wouldn't say tantrums, but if she
15 didn't want to do something or she didn't want
16 something happening to her, she would cry in
17 class, stomp her feet.

18 And I had a meeting with her parents
19 about it because she would cry for 5 or 10
20 minutes in class if she didn't want to open up
21 her math book or she didn't want to come into
22 class that day, things like that.

23 Q. When did you first notice those issues
24 that you just described?

25 A. Mostly at the beginning of the school

1 year.

2 Q. Would that be --

3 A. August, September.

4 Q. Of 2022?

5 A. 2022.

6 Q. And you said you had a meeting with
7 Jane's parents about this?

8 A. Yes.

9 Q. Was this a parent-teacher conference?

10 A. Yes.

11 Q. And did you have to fill out any forms
12 to have that parent-teacher conference?

13 A. I did.

14 Q. And what does that form look like?

15 A. It's a parent-teacher conference form
16 and you fill out what was spoken about, and the
17 parents sign and I sign as well, whoever was
18 present in the meeting.

19 Q. And what did Jane's parents say when you
20 shared these issues with them in that meeting?

21 A. They knew how Jane was. She had those
22 same behavior problems previously in pre-K as
23 well. And they said that they would have the
24 same conversations with her at home about crying
25 constantly in class. They were at first not

1 confused, but they didn't know what the picture
2 of kindergarten was, that it's rigorous, they do
3 class work, and they have exams, they thought it
4 was more of centered play.

5 So, I kind of walked them through what a
6 day looked like, and that they do have reading,
7 science, math, social studies and that was it.
8 And we came to the conclusion that for them to
9 motivate her at home to behave better in class,
10 they had a behavior system just to communicate
11 with her to motivate her to try to do better --
12 behave better.

13 Q. And did those issues continue after that
14 conference?

15 A. It wasn't as severe. It did iron out.
16 I built a relationship with her. She kind of got
17 into the gist of school. Did it happen every so
18 often? Yes, not as much or as frequently as it
19 was happening towards the beginning of the year.

20 Q. And besides that parent-teacher
21 conference form, did you ever document any of
22 these issues?

23 A. Just through behavior calendars that I
24 would send home and through, like, conduct
25 grades, but that was it.

1 Q. What are behavior calendars?

2 A. I had like a system in my class,
3 depending on what -- how they behaved for the
4 day, they would get a color and I would put it on
5 online like on a little app so the parents could
6 see how the kids behaved that day.

7 Q. And you mentioned conduct grades as
8 well; is that right?

9 A. Yes. Every quarter they would get a
10 behavior grade and you add comments.

11 Q. And was every teacher required to do
12 those conduct grades?

13 A. Yes.

14 Q. And how would you give the conduct
15 grades to students?

16 A. Depending on their conduct for the nine
17 weeks. So how they behaved on a day to day.

18 Q. Was this a paper form or something you
19 do electronically?

20 A. A report card.

21 Q. And this was mailed to the parents?

22 A. Sent home.

23 Q. And did AcadeMir keep a record of those
24 conduct grades too?

25 A. It's through a grade book. So, I'm not

1 sure.

2 Q. What grade book?

3 A. Like Miami-Dade Schools' grade book.

4 Q. And is there a scoring system of these
5 conduct grades?

6 A. In kindergarten, no. I mean, it's on,
7 again, the teacher's records, and my record was
8 through those behavior calendars.

9 Q. And you said you did those every nine
10 months; is that what you said?

11 A. Every quarter, yes, every nine weeks.

12 Q. And were those entered through the DSIS
13 system, I believe it's referred to?

14 A. That, I don't know.

15 Q. Where would you enter those forms?

16 A. In my grade book.

17 Q. Was that a website?

18 A. Yes, through Dade schools.

19 Q. How were Jane's conduct grades while you
20 taught her?

21 A. I don't remember specifically, but I do
22 know that I had to have the conversation with her
23 parents like consistent about her behavior.

24 Q. Did you ever share those issues with any
25 other employees of AcadeMir?

1 A. No, because it was managed. If it was
2 not controlled, then, yes, but it was manageable.

3 Q. Did you ever share those issues with
4 Susie Bello at any point?

5 A. I'm sure -- I know we had conversations
6 about the students and their temperaments and
7 their behavior, but specifically, I can't
8 remember.

9 Q. Was it common for you to discuss issues
10 like that with Susie Bello?

11 A. More common with Ms. Valladares because
12 she was in my building.

13 Q. Did you ever discuss these issues with
14 Jane with Ms. Valladares?

15 A. Yes.

16 Q. And when did you discuss those issues
17 with Ms. Valladares?

18 A. I can't remember specifically.

19 Q. And are you familiar with a student by
20 the name of ?

21 A. Yes.

22 Q. And I'll refer to him from this point
23 forward as L.R. if that's okay with you?

24 A. Yes.

25 Q. Did you teach L.R.?

1 A. I did.

2 Q. And was L.R. in that same class where
3 you taught Jane?

4 A. Yes.

5 Q. How long did you teach L.R. for?

6 A. The school year of 2022 to 2023.

7 Q. During L.R.'s enrollment, did he ever
8 have any disciplinary issues?

9 A. No, he did not.

10 Q. And did he have any behavior issues or
11 conduct issues?

12 A. No, he did not.

13 Q. And did you give conduct grades for L.R.
14 as well?

15 A. Yes.

16 Q. And do you recall how his conduct grade
17 results were?

18 A. He received principal honor roll, so
19 that's straight E's for kindergarten, which is
20 A's.

21 Q. Well, do you recall any grades given on
22 the -- sorry -- any results that you gave as part
23 of those conduct grades for him specifically?

24 A. Yes, A, it would be an E, which is
25 excellent.

1 Q. And do you recall if you ever gave an E
2 for excellent to Jane when you taught her?

3 A. I can't recall.

4 Q. Did you communicate with L.R.'s parents
5 on a regular basis?

6 A. Yes.

7 Q. What were L.R.'s parents names?

8 A. The dad, I can't remember. Mom is
9 [REDACTED]

10 Q. And do you know what L.R.'s mother did
11 for work?

12 A. No.

13 Q. Do you know what L.R.'s father did for
14 work?

15 A. No, I do not.

16 Q. And how often would you communicate with
17 L.R.'s parents?

18 A. Just as often as any of the other
19 parents.

20 Q. At any point did Jane report sexual
21 harassment by L.R. to you?

22 A. Sexual harassment, no.

23 Q. Did Jane at any point report any kind of
24 issue with L.R.?

25 A. Yes.

1 Q. And what did she report?

2 A. She told me that L.R. told her that he
3 wanted to lick the tetas and touch her cuca.

4 Q. You said that she reported that L.R. had
5 stated that he wants to lick her tetas and touch
6 her cuca; is that right?

7 A. Yes.

8 Q. And do you know what the term "tetas"
9 was referring to?

10 A. Yes.

11 Q. Was that referring to her breast?

12 A. Yes.

13 Q. And the term "cuca," is that referring
14 to her vagina?

15 A. I'm going to assume so. I did not ask.

16 Q. And when did she tell you about this
17 incident?

18 A. She had told the PE teacher, and when I
19 went to go pick her up from the PE, the PE
20 teacher had told me, so I pulled her aside to ask
21 her if there was anything she wanted to tell me
22 from what she told Ms. M, and that's when she
23 told me.

24 Q. Did she share anything about the
25 circumstances in which this occurred?

1 A. No, I asked her if she could tell me
2 when it happened, or where. I wanted to know
3 like did it happen before lunch, did it happen at
4 breakfast or during PE. And she didn't remember.

5 And then I said, "Okay. Do you know
6 where? Was it in the classroom or in the park?"
7 And she wasn't able to tell me.

8 I told her, "Thank you for letting Ms. M
9 know. It was a nice thing that you said
10 something."

11 Q. And you said the park, what is that?

12 A. Where they play. Where they have recess
13 and they have PE.

14 Q. It's an outdoor area, I'm guessing?

15 A. Yes.

16 Q. And what was your reaction when you
17 learned what Jane had alleged?

18 A. That it was outrageous, hearing it
19 coming from her, hearing her say it. It's not
20 out of the ordinary for kids sometimes to say
21 things that are inappropriate. So I brought her
22 inside and I asked Ms. Castellon, someone in the
23 office, to ask her in Spanish because that is her
24 first language and she had a little bit of an
25 accent so I wanted to be sure what I was hearing

1 I heard correctly, especially since she said the
2 terms in Spanish.

3 And so I asked Ms. Castellon, who also
4 had a relationship with her in pre-K, to ask her
5 again in Spanish and to make sure that he said it
6 and that he didn't touch her because I asked her
7 "Did he touch you? Did he touch you anywhere?"
8 And she told me, "No. No."

9 And I said, "Okay. Are you okay?"

10 She said, "Yes."

11 So, when I brought her inside I wanted
12 to make sure that I was getting the truth. So I
13 asked Zoley, Ms. Castellon to ask her again in
14 Spanish before I contacted the parents to let
15 them know, both parents.

16 Q. And did Ms. Zoley speak with Jane?

17 A. She did.

18 Q. And what did she tell you about that
19 conversation?

20 A. She told me that she asked her what
21 happened and she repeated the same thing. And
22 Ms. Castellon asked her in Spanish if she had
23 been, like, touched or bothered, and Jane had
24 told her, "No. No. No."

25 And I also asked Ms. Castellon if she

1 could ask her if she remembered when or where,
2 and she wasn't able to give an answer.

3 Q. And did Ms. Zoley translate the parts of
4 the body that she was referencing with those
5 terms "cuca" and "tetas"?

6 A. Yes. To me, well, "tetas," I knew, I
7 think it was a Cuban reference. I don't know if
8 that's what she told me.

9 Q. What did she say the term "cuca" in this
10 context meant?

11 A. It wasn't a saying. It was more of a
12 gesture.

13 Q. What did she gesture?

14 A. Just pointing like down like it's a
15 private.

16 Q. Like the groin area?

17 A. Yes.

18 Q. Why did you think it was outrageous what
19 she had reported?

20 A. Because they're talking about their
21 privates.

22 Q. Was that out of the ordinary for a
23 student of that age?

24 A. Not out of the ordinary, but, of course,
25 hearing a student say the words was -- I wouldn't

1 say shocking, but it's not something that happens
2 every day.

3 Q. Had you ever had something like that
4 happen in the past?

5 A. Similar, yes, not specifically, but
6 through the years, yes.

7 Q. What have you had happen that was
8 similar?

9 A. I've had students that talk about --
10 like showing in the bathroom, like a boy, that's
11 the only specific example I can recall, but they
12 are five years old, and it happens a lot where
13 you have to correct them and let them know it's
14 not for school.

15 Q. What happened after you spoke with
16 Ms. Zoley?

17 A. It was during dismissal time, so it was
18 time for the students to go home. I had a
19 meeting with L.R.'s mom. And then I asked her if
20 she could call Jane's parents to relate what had
21 happened because they spoke Spanish and I wasn't
22 able to communicate it to them.

23 Q. And this meeting took place at dismissal
24 time that day?

25 A. Yes.

1 Q. Where did it take place physically?

2 A. With who? With -- which meeting?

3 Q. Your meeting with L.R.'s mother.

4 A. In my classroom.

5 Q. And that was at dismissal time that you
6 mentioned --

7 A. Yes.

8 Q. And what was L.R.'s mother's response
9 when you shared this information with her?

10 A. She was embarrassed and shocked and she
11 apologized.

12 Q. And you asked L.R.'s mother to contact
13 Jane's parents?

14 A. No, I did not.

15 Q. Who did you ask to contact Jane's
16 parents?

17 A. Ms. Castellon to let them know what had
18 happened.

19 Q. And did Ms. Zoley contact Jane's
20 parents?

21 A. Yes.

22 Q. And was that via phone?

23 A. Yes.

24 Q. Did that take place prior to your
25 meeting with L.R.'s mother at dismissal?

1 A. I don't remember the timeline.

2 Q. Do you know if it was prior to dismissal
3 that Ms. Zoley called?

4 A. No.

5 Q. Did Ms. Zoley share with you how that
6 phone call went?

7 A. Verbatim, yes, but it was in Spanish.

8 Q. What do you recall that she had told
9 you?

10 A. That she had told the mom what L.R. had
11 said to Jane and the mom, she said, she
12 understood and she said, "You know, kids will be
13 kids." And that was it, that was the end of the
14 conversation.

15 Q. And you around dismissal time spoke with
16 L.R.'s mother; is that right?

17 A. Yes.

18 Q. Did you request a meeting with L.R.'s
19 mother?

20 A. I did. She picks him up in the car
21 line, so I asked her if she could come inside and
22 speak with me before -- it was a Friday and I
23 wanted to talk to her before the weekend.

24 Q. And you said that L.R.'s mother was
25 embarrassed about what you told her?

1 A. Yes.

2 Q. At any point during your meeting, did
3 L.R.'s mother say that something may have
4 happened at home?

5 A. No, she didn't give me details.

6 Q. At any point during your meeting with
7 L.R.'s mother, did she say that L.R. had seen
8 something that caused him to make those comments?

9 A. No.

10 Q. At any point up to this meeting with
11 L.R.'s mother, were you concerned that something
12 could be going on with L.R. at home?

13 A. No, I spoke to him after I spoke to
14 Jane, and I asked him why he said that, and he
15 said he heard it at home.

16 Q. Did he say how he heard it at home?

17 A. No.

18 Q. Were you concerned about that
19 specifically?

20 A. Yes. And I told him when he hears
21 things or sees things at home, that we don't
22 bring it to school, and that we don't talk about
23 things like that. And he apologized. And that
24 was it.

25 Q. Did you ask L.R.'s mother what he may

1 have seen?

2 A. No, I did not.

3 Q. Why not?

4 A. Because at that point, that's what's
5 happening in their house.

6 Q. Were you concerned that L.R. could have
7 been exposed to sexual material at home?

8 A. No, because it wasn't something that had
9 happened before.

10 Q. Meaning that L.R. had not had an issue
11 like that in the past?

12 A. Right, he had never said anything or had
13 done anything to make me --

14 Q. And what happened after that meeting
15 with L.R.'s mother?

16 A. She went home with him.

17 Q. Did the school do anything at your
18 meeting with L.R.'s mother that you are aware of?

19 MS. KARRON: Objection to form.

20 MR. MACDONALD: Go ahead.

21 THE WITNESS: I spoke to Ms. V
22 about what happened at the end of the
23 day.

24 BY MR. MACDONALD:

25 Q. And what did you share with

1 Ms. Valladares?

2 A. What had happened in the classroom.

3 Q. And what was her response?

4 A. I don't remember specifically. It was
5 just a recap so I could let her know that I spoke
6 to both parents.

7 Q. Do you recall if she was surprised or
8 shocked?

9 A. No.

10 Q. Did Ms. Valladares tell you if she was
11 going to speak to anyone about that incident?

12 A. I can't remember.

13 Q. At any point did you speak with Susie
14 Bello about this incident?

15 A. I did.

16 Q. When did you speak with Ms. Bello?

17 A. The following week.

18 Q. Do you recall what day you spoke with
19 Ms. Bello?

20 A. I know on Tuesday.

21 Q. And did you ask to meet with Ms. Bello
22 on Tuesday?

23 A. Well, I had the parent conference with
24 Jane's parents on Tuesday. So, I met with
25 Ms. Bello after.

1 Q. And why did you have a parent conference
2 on that Tuesday with Jane's parents?

3 A. They reached out because they said that
4 Jane said that there was more that happened.

5 Q. Who reached out? Was it Jane's mother
6 or father?

7 A. Jane's mother.

8 Q. How did Jane's mother contact you?

9 A. Through our school, the app that we use
10 for communication.

11 Q. And what specifically did she tell you?

12 A. She said -- I don't remember the message
13 specifically, but it was the next day and she
14 said that "Jane said that there was scary details
15 from under the table with that boy and I would
16 like a meeting to discuss it."

17 Q. And when you met with Jane's parents in
18 that conference, what did they share with you?

19 A. They said that he touched her under the
20 table and licked her. I can't remember if it was
21 licked her up here or licked her down here, but I
22 know that they were saying that she was touched
23 under the table.

24 Q. And what did you say in response?

25 A. I asked if they remember if Jane told

1 them. They mentioned a table, so I wanted to
2 know what table. We have a table in the
3 classroom, we have a table in breakfast, in
4 lunch, and I was trying to assure them that in my
5 classroom, that that incident did not take place
6 on Friday. I was vigilant. I was watching them.
7 We had testing. They had their test dividers up.
8 They were separated. I was circulating the room.
9 They did not have free time that day for
10 something like that to occur.

11 I showed him where she sat in proximity
12 to my desk so he could visualize it. And I was
13 asking if there were more details, so that maybe
14 I could put pieces together if that was even a
15 possibility to happen. I was assuring them that
16 that did not happen under my supervision.

17 Q. And you mentioned that you were
18 supervising the students that Friday?

19 A. Uh-huh.

20 Q. And that is that Friday, January 20th;
21 is that right?

22 A. Yes.

23 Q. On January 20th, that day, did the
24 students have time in the park?

25 A. For their PE. At the end of the day

1 with the PE teacher.

2 Q. And are the students fully supervised
3 the entire time?

4 A. Yes.

5 Q. And are the students confined to a
6 specific area during that PE period?

7 A. Yes.

8 Q. How did that meeting conclude with
9 Jane's parents?

10 A. The dad was visibly upset and they
11 assured me that they understood, they know that
12 my relationship with Jane was strong, so they
13 were assuring me that they weren't saying
14 anything about my teaching, like maybe I wasn't
15 looking. And I tried to assure them, that I know
16 that that couldn't have happened in my classroom.
17 Someone would have said something. She sits
18 elbow-to-elbow with another student who would
19 have seen if something happened in the classroom.
20 She was wearing jeans that day and she would have
21 had to stand up. There would have been witnesses
22 if it happened in my classroom, and the dad
23 wanted to see camera footage.

24 Q. You mentioned Jane wearing jeans?

25 A. Yes.

1 Q. Are you referring to her wearing jeans
2 on that Friday, January 20th?

3 A. Yes.

4 Q. Why is that important that she was
5 wearing jeans?

6 A. I believe if something were to have
7 happened, jeans would have had to come off or
8 pulled down and she was sitting the whole time in
9 my class.

10 Q. Did Jane's parents allege that Jane had
11 her pants taken down and was touched?

12 A. I can't remember. I know that they said
13 she was touched under the table. I can't
14 remember if that was mentioned.

15 Q. When you spoke with Jane's parents, did
16 you consider whether she may have been referring
17 to something that may have occurred on a previous
18 day?

19 MS. KARRON: Objection to form.

20 Calls for speculation.

21 MR. MACDONALD: Go ahead.

22 THE WITNESS: No.

23 BY MR. MACDONALD:

24 Q. Why not?

25 A. Because I would assume that it would be

1 told on that day, especially when they're little.
2 They don't have -- the memory, it doesn't last,
3 at least the details of situations that happened
4 don't last for long-term.

5 Q. What happened following that meeting
6 with Jane's parents?

7 A. In regards to what specifically?

8 Q. Do you know if Jane met with anyone
9 following that meeting with her parents?

10 A. I know that the counselor pulled her out
11 of my class to speak with her. The counselor
12 also pulled out L.R. as well.

13 Q. When did that happen that Jane was
14 pulled out of the class?

15 A. I think on Tuesday.

16 Q. And who was the guidance counselor at
17 that time?

18 A. Ms. Ruiz.

19 Q. Is that Stephanie Ruiz?

20 A. I'm trying to think of her first name.
21 Yes.

22 Q. And did Ms. Ruiz speak with you after
23 that first meeting with Jane?

24 A. Yes.

25 Q. And what did she tell you?

1 A. She told me that Jane told her that it
2 was -- I was concerned because I also wanted to
3 know the truth of if what her parents were saying
4 was true or if it was what she had told me on
5 Friday. And Jane had told her the same thing
6 that she had told me, that Jane had said it.

7 Q. Did Ms. Ruiz tell you about the meeting
8 with L.R.?

9 A. Yes.

10 Q. And what did she say about that?

11 A. That he had heard it from home, what was
12 said.

13 Q. Did she tell you how he heard it?

14 A. No.

15 Q. Did she tell you anything else about
16 that meeting with L.R.?

17 A. No.

18 Q. Do you know if Ms. Ruiz documented those
19 conversations with Jane and L.R.?

20 A. I don't know.

21 Q. At any point did Jane's parents ask you
22 to listen to a recording?

23 A. No.

24 Q. Do you know if Jane's parents tried to
25 show anyone else that recording at AcadeMir?

1 A. After that meeting that day, on Tuesday
2 with the parents, I was not involved.

3 Q. But you spoke with Ms. Valladares after
4 that meeting; correct?

5 A. Yes.

6 Q. And what was that, that meeting with
7 Ms. Valladares?

8 A. I can't remember. At some point during
9 the school day.

10 Q. Did that take place in her office?

11 A. That I can't remember either.

12 Q. And what did Ms. Valladares say to you
13 in that meeting?

14 A. She told me that the father was upset
15 and that's it from what I can remember.

16 Q. And Ms. Valladares didn't make any
17 mention of a recording from Jane?

18 A. No.

19 Q. Do you know if AcadeMir conducted an
20 investigation in response to what Jane had
21 alleged?

22 A. No.

23 Q. You don't know?

24 A. No.

25 Q. At any point did you consider reporting

1 what Jane had alleged to the Florida Department
2 of Children and Families?

3 A. No.

4 Q. Why not?

5 A. Because what Jane had told me was that
6 he said something inappropriate to her.

7 Q. And you didn't think those allegations
8 were sufficient to report to DCF?

9 MS. KARRON: Objection to form.

10 THE WITNESS: At that moment, no,
11 because it wasn't a pattern. It was
12 like a one-time -- it happened one time.
13 If it would have happened again, if it
14 had happened in the past -- and also
15 Jane didn't seem distraught, emotionally
16 upset. She was fine.

17 BY MR. MACDONALD:

18 Q. At any point during your employment at
19 AcadeMir, did you receive any training related to
20 reporting to the Department of Children and
21 Families?

22 A. In one of those webinars, yes.

23 Q. And after that training what was your
24 understanding of those requirements?

25 A. If there are visible signs or suspected

1 signs of abuse or neglect, they were to be
2 reported.

3 Q. Did Jane continue to be enrolled in your
4 class after that incident?

5 A. For a few days.

6 Q. When did Jane withdraw from enrollment?

7 A. I don't remember specifically. I know
8 she was absent. I think she came to school that
9 Tuesday, Wednesday. And that was the last day
10 she was in my class, on Wednesday.

11 Q. Do you know why Jane withdrew?

12 A. No.

13 Q. Did you ever discuss Jane's withdrawal
14 with any employees at AcadeMir?

15 A. Yes, Ms. Valladares had told me to pack
16 up her supplies just in case Dad wanted to
17 come -- her parents wanted to come and pick it
18 up.

19 Q. Were any referral forms issued for L.R.
20 as a result of what Jane had reported?

21 A. I did not write one, but I don't know if
22 there was.

23 Q. Did you write any kind of referral form
24 for Jane?

25 A. No.

1 MR. MACDONALD: Let's go ahead and
2 go off the record.

3 (A brief break was had.)

4 MR. MACDONALD: Now, I'm going to
5 show you a document. We're going to
6 mark this as Plaintiff's Exhibit 1. And
7 the document is titled "Miami-Dade
8 County Public Schools Student Referral."

9 (Plaintiff's Exhibit No. 1 was
10 marked for identification.)

11 THE WITNESS: Okay.

12 BY MR. MACDONALD:

13 Q. Do you recognize that document?

14 A. I'm aware of it, yes.

15 Q. How are you aware of it?

16 A. Ms. Bello had told me that she had
17 referred him.

18 Q. And "him" being L.R.?

19 A. Yes.

20 Q. When did Ms. Bello tell you about the
21 referral?

22 A. I can't remember. I think that Tuesday.

23 Q. And did Ms. Bello say why she was
24 issuing that referral form?

25 A. Yes, she wanted documentation of L.R.'s

1 comment.

2 Q. Now, on this document, on the bottom
3 left-hand corner, there's a comment section?

4 A. Uh-huh.

5 Q. And do you see where it says, "Mom was
6 notified via phone and in writing"?

7 A. Yes.

8 Q. Do you know if L.R.'s mother was
9 contacted via writing?

10 A. I think this would be the -- it could
11 be. I don't know. I did send her a message, but
12 I talked to her in person.

13 Q. How did you send her a message?

14 A. On the Our Class app that we use.

15 Q. And what did you say in that message?

16 A. Just that I needed to speak to her about
17 an incident that happened during class.

18 Q. And in that same section, do you see
19 where it says "referred to student services," it
20 looks like?

21 A. Yes.

22 Q. Do you know what student services L.R.
23 was referred to?

24 A. The counselor.

25 Q. And on the document do you see where it

1 says "referral action code"?

2 A. Yes.

3 Q. Do you know what that is referring to?

4 A. There are certain codes for certain
5 behaviors. I just don't know right now off the
6 top of my head.

7 Q. And do you see on the right-hand corner
8 of those lower boxes where it says "computer
9 recorded"?

10 A. Yes.

11 Q. Do these forms have to be entered
12 electronically at AcadeMir anywhere?

13 A. I don't know. That's for
14 administration.

15 Q. You've never had to enter any referral
16 forms?

17 A. No.

18 Q. Did Ms. Bello say anything else to you
19 when she spoke to you about this referral form?

20 A. No.

21 Q. When you were a teacher at AcadeMir, did
22 the school utilize the Miami-Dade County Public
23 Schools' Code of Student Conduct?

24 A. I don't know if it's the same one. I
25 know they had a code of conduct. I don't know if

1 it's Miami-Dade County's.

2 Q. I'm going to show you a document. We'll
3 mark this as Plaintiff's Exhibit 2. And this is
4 called "Elementary Code of Student Conduct."

5 (Plaintiff's Exhibit No. 2 was
6 marked for identification.)

7 BY MR. MACDONALD:

8 Q. Do you recognize that document?

9 A. Yes, I do.

10 Q. And what is it?

11 A. It's our code of student conduct for
12 MDCPS.

13 Q. And did AcadeMir utilize that code while
14 you were an employee there?

15 A. They utilized a code of conduct. I
16 don't know if it was the same one. I would have
17 to see it again.

18 Q. Do you know if there is a different
19 student conduct code that AcadeMir had in place?

20 A. That, I do not know.

21 Q. Did you ever have to review the code of
22 student conduct when you were an employee at
23 AcadeMir?

24 A. Yes, and we would have the parents sign
25 it.

1 Q. Do you know if AcadeMir had a separate
2 student handbook that was distinct from the
3 Miami-Dade County code of conduct?

4 A. No. I know they had a contract, but I
5 don't remember.

6 Q. And what do you recall about the code of
7 student conduct that you reviewed when you worked
8 at AcadeMir?

9 A. It was a list of rules and guidelines
10 that the parents and the students had to abide
11 by.

12 Q. I want to draw your attention to page 43
13 of that document. I want to draw your attention
14 to the section titled "Sexual Harassment." I'll
15 give you a moment to review.

16 A. Yeah.

17 Q. When you were employed at AcadeMir, did
18 they utilize this sexual harassment section here?

19 A. I don't know. I can't remember.

20 Q. Now, earlier you testified about ADP
21 training related to sexual harassment training
22 you received; is that right?

23 A. Yes.

24 Q. Did you receive any sexual harassment
25 training that was unique to AcadeMir?

1 A. I can't remember.

2 Q. When you worked at AcadeMir, what was
3 your understanding of the procedures for handling
4 student sexual harassment complaints?

5 A. A sexual harassment complaint, I would
6 report it to my administration.

7 Q. Anyone in particular in the
8 administration that you would have to report that
9 to?

10 A. Not specifically because administration
11 changes, but administration.

12 Q. And would you have to do anything
13 outside of making that report to the
14 administration?

15 A. Depending on the nature -- if I witness
16 something, if there's witnesses, if something is
17 physical or verbal, yes.

18 Q. What do you mean if something was
19 physical or verbal?

20 A. Like, if I saw something with my own
21 eyes, there is a route that I -- I can
22 self-report or I would write a referral myself or
23 do a behavior tracking form or whatever the case
24 is. It depends on case by case.

25 Q. And does that procedure differ if you do

1 not personally witness the sexual harassment?

2 A. Can you clarify that question?

3 Q. Well, I believe you mentioned that in
4 certain circumstances you may have to report
5 things yourself as a teacher at AcadeMir; is that
6 right?

7 A. Yes.

8 Q. And you mentioned if you witnessed
9 something; is that right?

10 A. Yes.

11 Q. What was your understanding of the
12 reporting requirements if you learned of
13 something but you did not witness it personally
14 involving sexual harassment?

15 A. Learned of something, like if a student
16 were to come and tell me?

17 Q. What were the reporting requirements in
18 the event of a student reporting sexual
19 harassment that you did not witness personally?

20 A. Specifically, I don't know. I don't
21 know. Again, I would have the conversation with
22 administration.

23 Q. When you worked at AcadeMir, did you
24 know what the Miami-Dade County Public Schools
25 Office of Civil Rights Compliance was?

1 A. Yes.

2 Q. And what did you know about it at that
3 time?

4 A. It's like a hotline to call.

5 Q. When you worked at AcadeMir, were you
6 ever instructed in what particular circumstances
7 you were supposed to contact that hotline?

8 A. Specifically, no, I can't remember.

9 Q. Now, I want to draw your attention to
10 page 83, specifically to the section labeled
11 "Sexual Harassment Level III Behavior." And I'll
12 give you a moment to review.

13 A. Okay.

14 Q. While you were employed at AcadeMir, did
15 AcadeMir utilize this definition of "sexual
16 harassment"?

17 A. I don't know.

18 Q. Did you ever receive training at
19 AcadeMir as to what specifically constituted
20 sexual harassment?

21 A. Possibly in those trainings, but
22 specifically I can't remember.

23 Q. Now, previously I believe you testified
24 that you did not believe the verbal allegations
25 made by Jane were necessarily out of the

1 ordinary; is that right? And correct me if I'm
2 wrong, please.

3 A. Yeah, in the sense of kids say
4 inappropriate things, especially at five years
5 old.

6 Q. And in the sexual harassment definition
7 I just showed you, there's references to verbal
8 conduct or comments. Do you see that?

9 A. In the second paragraph?

10 Q. Yes.

11 A. Yes.

12 Q. When you worked at AcadeMir, how did you
13 determine whether a student report of verbal
14 conduct rose to the level of sexual harassment?

15 A. If it did or if it did not?

16 MS. KARRON: Object to form.

17 BY MR. MACDONALD:

18 Q. How did you make that determination one
19 way or the other?

20 A. There was no intent or maliciousness
21 behind what he said, the student. And Jane,
22 again, did not seem distraught or upset.

23 Q. And what do you mean by intent or
24 maliciousness?

25 A. I think he said it without knowing what

1 he was saying.

2 Q. What led you to believe that?

3 A. He's five years old and he said he did
4 not know why he said it, that he heard it at
5 home. I also didn't think it was targeted. I
6 think they just sat next to each other.

7 Q. What do you mean by that?

8 A. I don't think that he was -- the word,
9 it says here, "intimidating, hostile." I don't
10 think he was being intimidating or hostile.

11 Q. You did not believe that the comment
12 that Jane alleged could be perceived by her as
13 intimidating or hostile?

14 A. Not that I don't believe it. She wasn't
15 upset about the comment. She was telling -- she
16 told me that he was bothering her and he said
17 that to her. And I asked her if she was okay and
18 she said yes. So, I don't think that it was
19 coming from a place of maliciousness or from
20 harassment.

21 Q. And were there any guidelines or
22 procedures that you used to make that
23 determination?

24 A. No. Written or -- no.

25 Q. There were no written guidelines or

1 procedures?

2 A. That I referred to in that moment, no.
3 Not that there is not any, but at that moment
4 when I made that judgment call, no.

5 Q. Are you aware of any guidelines or
6 procedures that did exist while you were working
7 at AcadeMir?

8 A. Specifically in regards to?

9 Q. In evaluating whether a student's
10 allegations would rise to the level of sexual
11 harassment.

12 MS. KARRON: Objection to form.

13 THE WITNESS: Word by word
14 specifically, no.

15 BY MR. MACDONALD:

16 Q. What do you mean word by word?

17 A. Like to sit here and to recite it, no.

18 Q. But are you aware of any documents
19 generally that contain guidelines or policies in
20 that manner?

21 A. Yes.

22 Q. And what documents are those?

23 A. We have in our -- well, not anymore --
24 well, there's a -- there's documents that I know
25 were available through HR.

1 Q. Documents were available through HR?

2 A. Uh-huh, like that has the same thing as
3 the code of student conduct.

4 Q. It was a code of student conduct?

5 A. Yes, the one that we have -- not we,
6 that AcadeMir had.

7 Q. Okay. And you're saying HR would have
8 that document available --

9 A. Well, yeah.

10 Q. -- when you worked at AcadeMir?

11 A. We had those documents available. Yes.

12 MR. MACDONALD: I'm going to show
13 you another document. Just give me a
14 moment. We'll mark this as Plaintiff's
15 Exhibit 3. And for the record, the
16 document is titled "Title IX Policies
17 And Procedures, Sex-Based Discrimination
18 and Sexual Harassment Manual." I'll
19 give you a moment to review.

20 (Plaintiff's Exhibit No. 3 was
21 marked for identification.)

22 THE WITNESS: Okay.

23 BY MR. MACDONALD:

24 Q. Do you recognize that document?

25 A. I do.

1 Q. And what is it?

2 A. It's the process for reporting sexual
3 harassment.

4 Q. You have seen this document before?

5 A. I have, in our opening of schools we
6 were provided it.

7 Q. What is the opening of schools?

8 A. It's the beginning of the year when we
9 go through all of our trainings.

10 Q. When did that meeting take place
11 typically?

12 A. They are always at the beginning of the
13 year before school starts.

14 Q. In August?

15 A. Yes.

16 Q. Where were those meetings held
17 typically?

18 A. Different locations, different campuses.

19 Q. Where was the last opening of schools
20 that you attended for AcadeMir held?

21 A. At -- I can't even remember the campus.
22 It was AcadeMir Prep, I think in Homestead, near
23 Eureka.

24 Q. And at that opening of schools meetings
25 you were given this document?

1 A. I can't remember if it was given to us
2 that particular school year.

3 Q. What do you mean?

4 A. Like, we're given binders that have a
5 lot of information in them. I can't remember
6 specifically if this was given last school year.

7 Q. So, do you know for a fact if you
8 received that specific document before?

9 A. Yes.

10 Q. And how do you know that if you don't
11 recall whether it was contained within those
12 binders?

13 A. Because I've seen it before as part of
14 the forms that we have received.

15 Q. And when exactly did you see it?

16 A. I worked for them for five years. I
17 can't remember.

18 Q. Did you have a copy of this document
19 when you worked at AcadeMir let's say in your
20 classroom?

21 A. I can't remember if it was physical or
22 if I had it online.

23 Q. Where would a policy like that be stored
24 online when you worked at AcadeMir?

25 A. Like, through -- we had a Google Drive,

1 a shared drive with all of the documents.

2 Q. And you mentioned a binder that you had?

3 A. Yes, a resource binder.

4 Q. And was that a binder that you put
5 together or the school?

6 A. No, the school put it together.

7 Q. And what was contained in the resource
8 binder?

9 A. Documents like this and forms and other
10 information.

11 Q. And who provided you with that resource
12 binder specifically?

13 A. Specifically, administration. I don't
14 know specifically whom, but it was provided by
15 the school.

16 Q. Did you get a new resource binder each
17 year?

18 A. Yes.

19 Q. And what did that binder look like?

20 A. It was just a one-inch binder that said
21 resources, "Faculty Resources."

22 Q. I want to draw your attention to the
23 fourth page, the third after the cover page. Do
24 you see in the first half of that page the
25 reference to a Title IX complaint form?

1 A. Uh-huh.

2 Q. Did AcadeMir have a Title IX complaint
3 form when you were employed there?

4 A. I don't remember.

5 Q. When you were employed at AcadeMir, did
6 you ever receive training or instructions on what
7 a Title IX complaint form is used for?

8 A. Specifically, not that I remember.

9 Q. At any point during your employment with
10 AcadeMir, did you receive any kind of training or
11 instructions on a notice of rights document under
12 Title IX?

13 A. Not that I can remember.

14 Q. Do you know who Olivia Bernal is?

15 A. Yes.

16 Q. And did you ever interact with her when
17 you worked at AcadeMir?

18 A. Yes.

19 Q. When would you interact with her?

20 A. She was my school principal for my first
21 two years.

22 Q. And did Ms. Bernal continue to work at
23 AcadeMir after those two years?

24 A. Yes.

25 Q. And what job did she perform?

1 A. I don't know her title, her role.

2 Q. Do you know if Ms. Bernal was
3 responsible for handling any Title IX matters
4 when you were employed at AcadeMir?

5 A. I don't know.

6 Q. After you learned of the allegations
7 that Jane had originally made, did her parents
8 ever request to have L.R. and her put in separate
9 classes?

10 A. The conversation -- I didn't have a
11 conversation with them about that.

12 Q. They never mentioned that to you?

13 A. No.

14 Q. Do you know if anyone from AcadeMir ever
15 offered Jane or Jane's parents counseling
16 services?

17 A. That, I do not know.

18 Q. That was never mentioned in any meeting
19 that you were part of?

20 A. No.

21 Q. After Jane withdrew from AcadeMir, did
22 anyone speak to you about the incident she
23 reported?

24 A. No.

25 Q. And at any point did any employees of

1 AcadeMir ask you to give a statement of any kind?

2 A. Like formally? I mean, I had
3 conversations with my administration, but that
4 was it.

5 Q. Who did you speak with in the
6 administration?

7 A. Ms. Valladares and Ms. Bello.

8 Q. And were those conversations after that
9 Tuesday when you spoke with Ms. Valladares?

10 A. I mean, I can't remember. We work
11 together all school year.

12 Q. And did anyone ever discuss this lawsuit
13 with you, prior to today?

14 A. No. Ms. Bello did mention I might get a
15 call from HR that the dad was pursing a case, but
16 that was all I knew. That was in February or
17 March and the subpoena was the first time I heard
18 about it since then.

19 Q. And that would be February, March of
20 this year?

21 A. I can't remember. I think it was in
22 March.

23 Q. And Ms. Bello called you?

24 A. No, I got a subpoena at my house.

25 Q. How did Ms. Bello contact you?

1 A. No, that was last year, in March when I
2 was still in the school.

3 Q. Was that a conversation that took place
4 in person in March of last year?

5 A. Yes.

6 Q. And what exactly did Ms. Bello say?

7 A. She just said don't be alarmed.
8 Expect -- you may get a call from HR, so don't be
9 surprised.

10 Q. You may get a call from HR about what
11 specifically?

12 A. She didn't say. She just said Jane's
13 dad was pursuing a case and I may get a call from
14 HR.

15 Q. And do you know who in HR she was
16 referring to?

17 A. No.

18 Q. Do you know who handled HR for AcadeMir?

19 A. Specifically, no.

20 Q. And did anyone end up contacting you
21 from HR?

22 A. No.

23 MR. MACDONALD: We can go ahead and
24 go off the record, but I should be done
25 very soon.

1 (A brief break was had.)

2 BY MR. MACDONALD:

3 Q. Now, earlier you testified you learned
4 about this incident with Jane from the PE
5 teacher; is that right?

6 A. Yes.

7 Q. What exactly did the PE teacher say to
8 you?

9 A. She said that L.R. said -- had made
10 inappropriate comments to her.

11 Q. Did she specify what the comments were?

12 A. No.

13 Q. And did she tell you why she was telling
14 you that?

15 A. No. It's just normal for her to report
16 anything that went on in her class.

17 Q. And during the time that you have taught
18 L.R. and Jane, did they ever have any problems
19 getting along?

20 A. Not out of the ordinary of five year
21 old -- five-year-olds.

22 Q. What do you mean?

23 A. Like, "He took my pencil" or they sat
24 next to each other and there would be times Jane
25 didn't want to do the work. And so if someone

1 opened the book for her, she would get upset, but
2 nothing out of the day-to-day.

3 Q. If someone opened Jane's book, what do
4 you mean?

5 A. Again, she had some behavior issues
6 where she wouldn't want to do the work or be on
7 task. So, I would give points, table points, and
8 I would give them if they were ready on the right
9 page or had their journals out, so not only him
10 but there were other students at the table that
11 would help, take things out, put the supplies
12 out, put the crayons out, and she wouldn't like
13 it when someone touched her crayons or pencils or
14 something like that. She was easily irritated, I
15 guess you could say.

16 Q. And what did that have to do with L.R.
17 specifically?

18 A. I don't think there was anything between
19 the two of them that was -- I don't know -- that
20 stood out.

21 Q. Do you recall any specific times where
22 they didn't get along even if it was something
23 trivial?

24 A. No.

25 Q. Did Jane ever have trouble getting along

1 with other students?

2 A. Yes.

3 Q. Which students?

4 A. Specifically, I don't know, but she
5 would play alone in the playground. She mostly
6 played with her cousin who was in the class with
7 her.

8 Q. Did L.R. ever have any issues getting
9 along with other students?

10 A. No.

11 Q. And did L.R. ever get into trivial
12 disagreements with students in the manner that
13 you just described?

14 A. No.

15 MR. MACDONALD: And those are all
16 the questions I have for you today.
17 Counsel for AcadeMir or Superior may
18 have some question. Thank you for your
19 time.

20 MS. KARRON: No questions. Thank
21 you for your time and we will waive
22 reading.

23 (Reading and signing were waived.)

24 (Thereupon, the taking of the
25 deposition was concluded at 5:43 p.m.)

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

I, the undersigned Notary Public, in and
for the State of Florida, hereby certify that
HIRA CHAUDRY personally appeared before me on
May 15, 2024, and was duly sworn by me.

WITNESS my hand and official seal this
15th day of May, 2024.

Katiana Louis

KATIANA LOUIS
Notary Public-State of Florida
COMMISSION #HH 443618
EXPIRES September 13, 2027

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

I, KATIANA LOUIS, do hereby certify that I was authorized to and did stenographically report the foregoing deposition; and that the transcript is a true and correct transcription of the testimony given by the witness.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated this 15th day of May, 2024.

Katiana Louis

KATIANA LOUIS